

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

EMIGUELA PACI,)	
)	14-cv-1158
Plaintiff,)	
)	Hon. Sharon Johnson Coleman
v.)	
)	
ELMHURST AUTO WERKS, LTD, d/b/a)	
ELMHURST BMW, LTD,)	
)	
Defendant.)	

PLAINTIFF’S CROSS-MOTION FOR SUMMARY JUDGMENT

Defendant Elmhurst Auto Werks, LTD, d/b/a Elmhurst BMW, LTD (“Defendant” or “BMW”) moved this Court for summary judgment, “on both the Plaintiff’s individual and class action claims.” (R. 23, Def. Memo. in support of Motion Summary Judgment, p. 2). Plaintiff Emiguela Paci, (“Plaintiff”), individually and on behalf of a proposed class, by and through her counsel, moves this Honorable Court under Rule 56 to enter summary judgment on Plaintiff’s and the proposed class’ claim regarding the form of the February 11, 2014 receipt, and individually as to the January 8, 2014 receipt.

Plaintiff is filing a combined memorandum in opposition to defendant’s motion for summary judgment and in support of Plaintiff’s cross-motion for summary judgment. Plaintiff further requests an adjustment to the current briefing schedule to add time in which she can file a reply in support of her cross motion for summary judgment.

WHEREFORE, for the reasons stated in her memorandum, Plaintiff requests this grant Plaintiff’s cross-motion for summary judgment on a class basis regarding the form of the February 11, 2014 receipt, and individually as to the January 8, 2014 receipt.

Respectfully submitted,

s/ Curtis C. Warner
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